

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: November 9, 2010  
Hearing Time: 10:00 a.m.

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In re: : Chapter 7  
:  
GENERATIONAL ART PRODUCTIONS, INC., : Case No. 10-12967 (SMB)  
:  
Debtor. :  
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**NOTICE OF HEARING ON MOTION  
OF THE CHAPTER 7 TRUSTEE FOR: (I) AN ORDER  
(A) APPROVING FORM OF AN AGREEMENT FOR THE TRUSTEE TO  
SELL ESTATE ASSETS, (B) APPROVING BIDDING PROCEDURE (INCLUDING  
BREAK-UP FEE), AND (C) APPROVING FORM AND MANNER OF NOTICE  
AND (II) AN ORDER APPROVING THE TRUSTEE'S SALE OF THE ASSETS**

**PLEASE TAKE NOTICE** that upon the motion ("Motion") of David R. Kittay, Chapter 7 Trustee in the above-captioned case, the Trustee will move this Court before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on November 9, 2010 at 10:00 a.m., or as soon thereafter as counsel may be heard (the "Hearing Date"), for: (a) entry of an order: (1) scheduling a hearing to approve the form of an agreement pursuant to which the Trustee will sell his right, title and interest in (i) all of the Debtor's assets specifically excluding any and all rights, claims, causes of actions, defenses or other intangible property arising out of, related to or in connection with any and all litigation (including avoidance actions) commenced or to be commenced by the Trustee on behalf of the Debtor's estate, whether pursuant to the Bankruptcy Code or applicable state law (collectively, the "Assets"), all subject to higher or better offers, (2) approving a previously distributed bid solicitation package and the bidding procedure for submission and acceptance of competing bids (including break-up fee), and (3) approving the form and manner of notice, pursuant to Sections 105, 363(b)(1), (f)(2) and 503(b) of Title 11 of the United States Code, Rules 2002 and 6004 of the Federal Rules of Bankruptcy Procedure and Rule 6004-1 of the Local Rules for the United States Bankruptcy Court Southern District of New York and (b) entry of an order approving the sale of the Assets.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Motion, the Trustee is explicitly seeking authority to conduct a public auction sale of his right, title and interest in the Debtor's Assets sometime shortly after the Hearing Date. If you require additional information about the Assets and/or how to participate in the public auction, please contact the Trustee's counsel: Michelle Gershfeld or Judy Siegel by telephone ((914) 332-8000) or by email addressed to: [mgershfeld@kittaylaw.com](mailto:mgershfeld@kittaylaw.com) or [jsiegel@kittaylaw.com](mailto:jsiegel@kittaylaw.com), respectively, and/or the Trustee's auctioneer, John Cronin at MYC & Associates, Inc., (347) 273-1258 or via his email address at: [jc@myccorp.com](mailto:jc@myccorp.com).

**PLEASE TAKE FURTHER NOTICE** that interested parties may obtain a copy of the Motion, with all exhibits, at no charge by contacting counsel to the Trustee, Kittay& Gershfeld, P.C., 100 White Plains Road, Tarrytown, New York 10591, (914) 332-8000, Attn.: Judy Siegel or via email at [jsiegel@kittaylaw.com](mailto:jsiegel@kittaylaw.com).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall be in writing, shall be served upon the undersigned attorneys for the Trustee at the address below and via email to [jsiegel@kittaylaw.com](mailto:jsiegel@kittaylaw.com), with a courtesy copy to Chambers and the Office of the United States Trustee, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004, Att'n: Susan Golden, Esq., so as to be received no later than three days before the Hearing Date; and shall be filed with the Clerk of the Bankruptcy Court together with proof of service.

**PLEASE TAKE FURTHER NOTICE** that each such objection shall state the name of the objecting party, its status as a party in interest, whether it has filed a claim in the above-captioned case, the amount of such claim and the nature and basis of its objection and conform with the following requirements:

objections filed by parties with legal representation shall be filed (a)(i) through the Bankruptcy Court's electronic filing system (in accordance with General Order M-182), which may be accessed (with a password which is available by contacting the Bankruptcy Court's technical assistance number at (212) 668-2870, ext. 3522, available Monday-Friday 8:30 a.m. through 5:00 p.m.) through the Internet at the Bankruptcy Court's website: [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) using Netscape Navigator software 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Acrobat Exchange software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of the document, document number of the document to which the objection refers and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use the PDF format, such party shall submit the objection on a diskette in either Word, WordPerfect or DOS text (ASCII) format. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth herein.

**PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion may be adjourned from time to time without further notice to any creditor or other party in interest other than by announcement of the adjourned date in open court on the Hearing Date.

Dated: Tarrytown, New York  
October 14, 2010

KITTAY& GERSHFELD, P.C.

By: /s/ Judith L. Siegel  
Judith L. Siegel  
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